

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IN RE HECKMANN CORPORATION  
SECURITIES LITIGATION

Case No. 1:10-cv-00378-LPS-MPT

**CLASS ACTION**

**DECLARATION OF ISRAEL DAHAN**

Pursuant to 28 U.S.C. § 1746, Israel Dahan, hereby declares:

1. I am a Member of the Bar of the State of New York and a Member of Cadwalader, Wickersham & Taft, LLP (“Cadwalader”). I submit this declaration in support of the Joint Opposition to the Plaintiff’s Motion for Leave to Serve Process By Alternative Means, dated August 26, 2011 (the “Joint Opposition”). This declaration is based on my personal knowledge.

2. In or about May 2009, Mr. Xu Hong Bin retained Cadwalader to represent him in a civil lawsuit against Heckmann Corporation (“Heckmann”) concerning his ownership of certain shares of Heckmann Common Stock. I was the lead attorney from Cadwalader handling the matter.

3. In connection with that representation, Mr. Xu also retained Mr. Kenneth J. Nachbar of the law firm Morris Nichols Arsht & Tunnell, LLP as Delaware counsel.

4. On June 1, 2009, Mr. Xu, by and through his attorneys, commenced a lawsuit against Heckmann and certain of its officers and directors in the Delaware Court of

Chancery, in a matter entitled Xu, et al. v. Heckmann Corp., et al., C.A. 4637-CC (the “Delaware Chancery Action”).

5. On or about April 3, 2011, the parties to the Delaware Chancery Action reached a global resolution of all claims and entered into a settlement agreement containing mutual releases.

6. On April 26, 2011, the parties to the Delaware Chancery Action entered into a stipulation, pursuant to Court of Chancery Rule 41(a)(1)(ii), to dismiss the Delaware Chancery Action and all claims asserted therein with prejudice.

7. With the termination of the Delaware Chancery Action, my representation of Mr. Xu ceased. Since that time, neither I nor, on information and belief, anyone from Cadwalader has represented Mr. Xu in any matter, nor performed any legal services on his behalf.

8. Since the termination of the Delaware Chancery Action, neither I nor, upon information and belief, anyone from Cadwalader has had any communications with Mr. Xu.

9. I am unaware of whether Mr. Xu has knowledge of Plaintiff’s Motion for Leave to Serve Process By Alternative Means, dated August 15, 2011.

Dated: New York, New York  
August 26, 2011

/s/ Israel Dahan  
ISRAEL DAHAN